

**BEFORE HEARING COMMISSIONERS DELEGATED BY FAR NORTH
DISTRICT COUNCIL / TE KAUNIHERA O TE TAI TOKERAU KI TE RAKI
AT KAIKOHE**

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the hearing of submissions on the Proposed Far North
District Plan

**STATEMENT OF REBUTTAL EVIDENCE OF BEN GRANT DALTON FOR
WAITANGI LIMITED (SUBMITTER 503)**

HEARING 15B (REZONING – NEW SPECIAL PURPOSE ZONES)

18 August 2025

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1. INTRODUCTION

- 1.1 My name is Ben Grant Dalton.
- 1.2 I have the qualifications and experience set out at paragraph 2.1 of my statement of primary evidence dated 30 May 2025.
- 1.3 My evidence is given on behalf of Waitangi Limited (Submitter 503) in relation to its submission on the Proposed Far North District Plan.
- 1.4 Waitangi Limited is the operating company of the Waitangi National Trust Board (**Trust Board**) and was established by the Trust Board in 2016 to manage the day-to-day operations of the Waitangi National Trust Estate (**Estate**), which contains the historic Waitangi Treaty Grounds / Te Pitowhenua (**Treaty Grounds**). Its submission related solely to the Estate.
- 1.5 My primary evidence sets out why the proposed Waitangi Estate Special Purpose Zone (**WEZ**) is required for the Estate. In my view, the proposed WEZ is the best option to protect the nationally significant values of the Treaty Grounds and wider Estate, to support the legislative and governance arrangements that apply to the Estate, and to enable future activities at the Estate that align with the Waitangi National Trust Board Act 1932, and Waitangi Limited and the Trust Board's priorities and strategic planning for the Estate.

2. SCOPE OF REBUTTAL EVIDENCE

- 2.1 In this statement, I:
 - (a) respond to the Council's section 42A report for the Waitangi Estate Special Purpose Zone (**s42A report**), where the report writer disagrees with Waitangi Limited's evidence in respect of signs proposed in the WEZ;
 - (b) briefly address how Waitangi Limited intends to engage with the Haukāinga¹ through the implementation of the WEZ; and
 - (c) provide an update on archaeological assessments currently being undertaken in respect of the Estate.

¹ The term Haukāinga, as used in the evidence of Ms Ngahuia Harawira dated 30 May 2025 and the CVA dated 13 May 2025, refers to local and neighbouring hapū and iwi who hold ancestral, historical and contemporary relationships with the whenua and includes local hapū, Ngāti Rāhiri, Ngāti Kawa and Te Matarahurahu, the wider Te Whare Tapu o Ngāpuhi.

3. WAYFINDING AND SIGNS IN THE WEZ

- 3.1 Signage and wayfinding are key matters for Waitangi Limited and are central to the overall operation and planning of the Treaty Grounds and wider Estate. Waitangi Limited takes a carefully planned and managed approach to signage that enables both effective wayfinding and the clear delivery of information.
- 3.2 Waitangi Limited is currently undertaking work to develop a comprehensive strategy for all wayfinding and interpretive signage on the Treaty Grounds and Estate. This strategy will outline a sign system, include a refresh of key routes, and will ensure all future facilities, uses and events take a consistent, clear and carefully designed approach to signage across the Estate and Treaty Grounds. This work is being led by Chris Hay of Locales, Wellington and commenced in July. Key wayfinding principles are set out in **Figure 1** below.

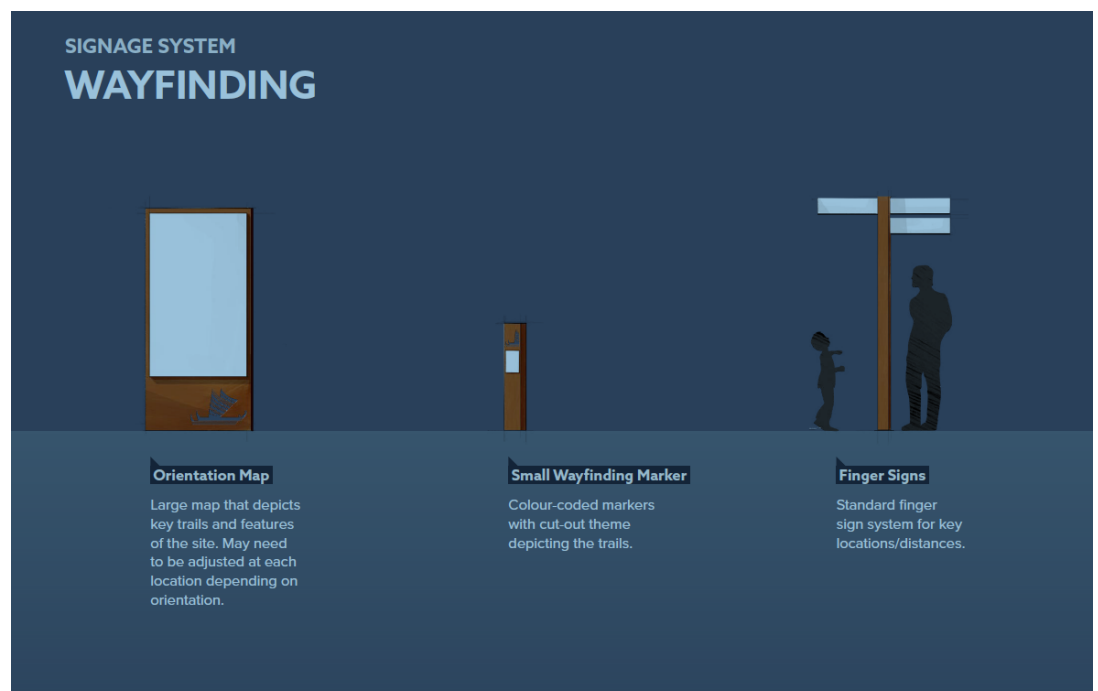


Figure 1: Wayfinding principles

- 3.3 One of the key principles guiding the strategy is to ensure that visitor signage provides both clear wayfinding and interpretive information, as well as signs that enable digital layering of information (such as QR codes). For this reason, and the reasons outlined in the rebuttal statements of Ms Jacobs and Mr Cocker, Waitangi Limited wishes to retain the requested maximum of two signs per activity where they are visible beyond the Estate,

noting that it will continue to manage carefully the impact of additional signs to avoid cluttered and confused wayfinding and any other adverse effects.

4. PROPOSED ENGAGEMENT WITH THE HAUKĀINGA THROUGH THE IMPLEMENTATION OF THE WEZ

- 4.1 In line with the evidence and cultural values assessment prepared by Ms Ngahuia Harawira, Waitangi Limited will engage with the Haukāinga to through the implementation of the WEZ to identify sites of significance and have these mapped at a detailed level, in addition to the existing mapping in the New Zealand Archaeological Association (**NZAA**) record. In addition, Waitangi Limited will engage both locally with Ngāti Kawa and Ngāti Rahiri, and regionally with Ngāpuhi-nui-tonu to discuss suitable guiding principles (tikanga whakahaere) to build a stronger partnership between the Haukāinga and Waitangi.

5. UPDATE ON ARCHAEOLOGICAL ASSESSMENTS CURRENTLY BEING UNDERTAKEN FOR THE ESTATE

- 5.1 The management of archaeological issues relating to the Estate is appropriately addressed by Waitangi Limited and the Trust Board in accordance with the *Heritage New Zealand Pouhere Taonga Act 2014* (**HNZPTA**) and the role of Heritage New Zealand Pouhere Taonga (**HNZPT**) under that Act. As recorded at paragraph 141 of the s42A report, HNZPT supports the WEZ.
- 5.2 Council officials have commissioned additional technical advice on the suitability of archaeological provisions in the WEZ, and a letter from Dr Andrew Brown is included at Appendix 5 of the s42A report. To this end, Waitangi Limited notes that all activities undertaken on the Estate are governed by the HNZPTA and are legally compliant. A series of detailed archaeological surveys have been undertaken across the Estate over the past 50 years, and 137 resulting sites have been carefully mapped and recorded via the NZAA database and mapping.
- 5.3 Waitangi Limited employs consultant archaeologist, Donald Prince, one of New Zealand's most experienced archaeologists, who has worked on all of the recent surveys and consented works. In 2024, Mr Prince conducted a desktop review of all pre-existing surveys and, in partnership with HNZPT, undertook a further archaeological survey to address three remaining gaps in the coverage of previous surveys. This gap-filling survey work was

undertaken in May 2025. As part of the wider work underway across the Estate, Waitangi Limited has also recently instituted an archaeology policy and process and provided staff training.

- 5.4 In his 2024 report, Mr Prince noted that further work can be done to ensure that protection and preservation remain paramount in all planning including our annual management planning cycle and teamwork plans. Adopting the proposed WEZ will better enable Waitangi Limited to take an integrated approach to improving archaeological protection and management across the entire Estate as it enables planning across groups of sites and features within specific sub-zones, not just individual or discrete sites.

CONCLUSION

- 5.5 In summary, the proposed WEZ is the best option to protect the nationally significant values of the Treaty Grounds and the wider Estate. The WEZ will enable Waitangi Limited to best manage the broad range of activities across the Estate, meet its legal obligations, and do so in a sustainable, holistic and integrated way. It also provides an important platform for the upcoming discussions and planning that will take place around the nation's bicentenaries in 2035 and 2040.

Ben Dalton

18 August 2025